

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: February 26th, 2018
2. Name of company covered by this certification: OnStar, LLC ("OnStar" or "company")
3. Form 499 Filer ID: 822794
4. Name of signatory: Christine Sitek
5. Title of signatory: Chief Operating Officer
6. Certification:

I, Christine Sitek, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001, *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in sections 64.2001, *et seq.*, of the Commission's rules.

OnStar has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at state commissions, in the court system, or at the Commission against data brokers) against data brokers in the past year.

OnStar has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

OnStar represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. OnStar also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: 
Christine Sitek
Chief Operating Officer
OnStar, LLC
400 Renaissance Center
MC482-D39-B-32
Detroit, MI 48265

Attachments: OnStar, LLC Explanatory Statement Regarding 2017 CPNI Compliance

OnStar, LLC
Explanatory Statement Regarding 2017 CPNI Compliance

OnStar, LLC (“OnStar” or “Company”) provides this statement pursuant to 47 C.F.R. § 64.2009(e) of the Federal Communications Commission (“Commission”) rules to explain how OnStar’s operating procedures are designed to comply with the Commission’s customer proprietary network information (“CPNI”) regulations. As explained below and as stated in the attached certification by Christine Sitek, OnStar is in compliance with the Commission’s CPNI rules as set forth at 47 C.F.R. §§ 64.2001, *et seq.* OnStar is a CMRS reseller, and its “Hands-Free Calling” is a pre-paid service. OnStar only generates invoices upon authenticated customer request, and the invoices do not contain call-detail information. OnStar obtains only a limited amount of CPNI that is accessible to and maintained by its underlying facilities-based providers of telecommunications service.

Compliance Certification

An officer of OnStar is required to sign and file with the Commission an annual CPNI compliance certification. The certification is based on the personal knowledge of the certifying officer, acquired through personal experience, information, and reasonable inquiry, and states that OnStar has established operating procedures designed to ensure compliance with the Commission’s CPNI rules.

CPNI Use

OnStar does not use, disclose, or permit access to CPNI by third parties without customer approval, except as permitted or required by law. Accordingly, the customer notice and associated record-keeping requirements of the Commission’s CPNI rules for permitting third-party access to CPNI without Customer approval are not applicable.

Procedures Designed to Ensure the Privacy and Security of CPNI

OnStar takes its obligations regarding the privacy and security of CPNI seriously and has implemented reasonable measures and controls to ensure compliance with the Commission’s CPNI rules. These measures and controls also are intended to enable OnStar to discover and protect against attempts by third parties to gain unauthorized access to CPNI. OnStar has developed a CPNI Policy (“CPNI Policy”) to facilitate compliance with the CPNI rules. OnStar has a process which requires the details of any alleged breach to be recorded and reviewed. OnStar also has implemented procedures governing the handling and storage of CPNI. As part of these measures, OnStar has implemented procedures to limit internal access to CPNI and has adopted procedures for internal investigations and audits to evaluate the security of CPNI data.

OnStar employees have responsibilities relating to the handling of privacy and data security issues, including those pertaining to CPNI. These individuals work in concert with other OnStar employees to implement OnStar’s privacy and security policies, which are designed to protect customer information, including CPNI.

In addition to its internal policies, which are consistent with the Commission's CPNI Rules, OnStar has a Privacy Statement which explains how OnStar collects, uses, and shares personal and vehicle information that OnStar obtains in connection with the services it provides in the United States. The Privacy Statement addresses CPNI. A copy of the Privacy Statement is provided to customers and is available on the OnStar web site at www.onstar.com/us/en/privacy_statement/.

Record Retention for Marketing Campaigns

OnStar has established processes to maintain records of sales and marketing campaigns that include permitted uses of CPNI. The records include, among other things, a description of each campaign, the specific CPNI that was used in the campaign and the products and services that were offered as part of the campaign. OnStar maintains these records for at least one year. OnStar also has two supervisory review processes regarding marketing campaigns that include the use of CPNI and maintains records of its compliance for at least one year.

Customer Authentication

OnStar has established processes that require proper authentication before disclosing CPNI. However, OnStar does not disclose call detail information over the telephone in response to customer-initiated telephone contacts. OnStar requires all requests for call detail information to be in writing, and responds to written requests for call detail information and other CPNI by sending a written response to the address of record.

Employee Training

OnStar trains employees who have access to CPNI data with respect to the Commissions' CPNI rules and the appropriate use of CPNI. These employees are required to follow the CPNI policy and all OnStar employees are required to follow the express written General Motors "Winning With Integrity" code of conduct ("GM Code"), which directs employees to understand the rules affecting their area of work and to perform assignments consistently with all applicable laws and regulations. With regard to the very limited amount of customer data that OnStar obtains in connection with its provision of "Hands-Free Calling" service, OnStar trains its call center advisors and employees who have access to CPNI with respect to the appropriate handling of customer data, including CPNI. This training includes the proper authentication of customers making inbound CPNI inquiries by telephone.

Account Changes

Whenever a PIN/password, customer response to a back-up means of authentication for a lost or forgotten PIN/password, online account, or address of record is created or changed, OnStar mails a notice to the customer's address of record. The notices do not reveal what specific information was changed.

Security Breaches

In the event of a security breach, the policies and procedures in the CPNI policy direct GM Security employees who are responsible for security breaches to notify law enforcement of a breach of OnStar customers' CPNI as soon as practicable, but in no event later than seven (7) business days after a reasonable determination has been made that a breach occurred. They will also notify customers about a breach of their CPNI consistent with the Commission's CPNI rules (*i.e.*, no sooner than the eighth business day following completion of the notice to law enforcement, except where such notification can be made sooner as provided for in the Commission's rules).

Recordkeeping

OnStar maintains a process for keeping a record for at least two years of all CPNI security breaches, breach notifications made to law enforcement, and breach notifications made to customers. To date, OnStar has not experienced any known breaches of CPNI.

During the applicable reporting period, OnStar received no customer complaints concerning the unauthorized release of CPNI. If a complaint is made, the complaint will be reported and investigated internally. In addition, the CPNI Policy requires a record of such complaints be maintained by category (*e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, and instances of improper access to online information by individuals not authorized), and a summary of any such customer complaints will be included in OnStar's annual CPNI certification.

OnStar acquired no information regarding the activities of, nor took any actions against, pretexters or data brokers during the applicable reporting period. If any such information is obtained, or if any such actions are taken by OnStar against pretexters and data brokers, OnStar will maintain a record of those actions and include an explanation of such actions with its annual CPNI certification.

Policy Changes

Should OnStar change its policies such that the use, disclosure, or permitted access to CPNI requires customer approval, OnStar will implement appropriate customer notification, approval and recordkeeping practices (including appropriate opt-out procedures and opt-out failure reporting) as required by the FCC's rules.